

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA) No. 25 CR 321
v.)
MOHAMED SIRAJUDEEN) Hon. Sharon Johnson Coleman

DEFENDANT SIRAJUDEEN'S MOTION TO PERMIT TRAVEL

Defendant Mohamed Sirajudeen, by his undersigned counsel, respectfully requests that this Court grant his permission to travel outside the continental United States from approximately October 10, 2025 through November 9, 2025.

1. Mr. Sirajudeen wishes to visit his 85-year-old mother who resides in Sri Lanka. His mother lives there with his sister, who is her caretaker. His mother suffers from Alzheimer's, which unfortunately is progressing. Mr. Sirajudeen very much wishes to spend time with his mother at this important moment. The undersigned counsel has provided to the government the exact address in Sri Lanka at which Mr. Sirajudeen would stay.

2. Mr. Sirajudeen is charged in one of count of the present indictment. He has been cooperating with authorities for more than one year, long before the indictment was even returned in this case. In fact, prior to the return of the indictment, Mr. Sirajudeen executed a letter agreement with the government reflecting the potential terms of his cooperation and plea.

3. Knowing that he was under investigation in this case, Mr. Sirajudeen previously has traveled internationally on multiple occasions and returned to the United States without incident.

4. Mr. Sirajudeen has posted his residence and adjacent property as security for the \$5,000,000 bond that he executed in this case. He lives at this property with his wife and son. They have lived there for more than 10 years, and his son attends school here in Chicago.

WHEREFORE, Defendant Sirajudeen respectfully requests that the Court grant his unopposed motion to permit travel outside the district from October 10, 2025 to on or about November 9, 2025.

Dated: October 2, 2025

/s/ Daniel J. Collins

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Respectfully submitted,

/s/ Stephen C. Lee

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Counsel for Defendant Mohamed Sirajudeen

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2025 I caused copies of the foregoing **DEFENDANT SIRAJUDEEN 'S MOTION TO PERMIT TRAVEL** to be served on all counsel of record by filing electronic copies with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered CM/ECF users.

/s/ Daniel Collins